

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:20 CR 143 JAR
)	
ROBERT HARRISON,)	
)	
Defendant.)	

**DEFENDANT’S MOTION IN LIMINE TO PROHIBIT ANY EMPLOYEE OF THE
STATE OF MISSOURI OR POLITICAL SUBDIVISION OF THE
STATE TO TESTIFY TO ENFORCE FEDERAL FIREARMS LAW**

NOW COMES Defendant, ROBERT HARRISON, by and through undersigned counsel, and respectfully moves this Honorable Court to prohibit any employee including State of Missouri and any local municipal law enforcement officers from a political subdivision of the State of Missouri, from testifying at Mr. Harrison’s trial in an effort to assist in the enforcement of federal firearms law.

Mr. Harrison is charged with violating 18 U.S.C. § 922(g)(1), a federal firearms law. Under the “Second Amendment Preservation Act”, “no entity or persons, including any public officer or employee of this state [of Missouri] or any political subdivision of this state [Missouri], shall have the authority to enforce or attempt to enforce any federal act, laws, etc., infringing on the right to keep and bear arms.” Thus, this Court should uphold Missouri Law and prohibit any state or local law enforcement from testifying in this case.

WHEREFORE the Defendant moves this Honorable Court to issue an Order in limine prohibiting any employee including State of Missouri and any local municipal law enforcement

officers from a political subdivision of the State of Missouri, from testifying at Mr. Harrison's trial in an effort to assist in the enforcement of federal firearms law.

Respectfully submitted,

/s/ Mohammed G. Ahmed
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CERTIFICATE OF SERVICE

Assistant Federal Public Defender Mohammed G. Ahmed certifies that he filed the foregoing electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Assistant United States Attorneys Natalie Warner, Kourtney Bell and Rodney Holmes.

Dated October 27, 2021.

/s/ Mohammed G. Ahmed